

Exhibit A

Statement of Fees



565 Fifth Avenue
Suite 2900
New York, NY 10017
(332) 269-0030
www.groombridgewu.com

DeCurtis Corp.
3208 East Colonial Drive
Suite C190
Orlando, FL 32803
USA

August 15, 2023
Reference No. 190

Professional Services from July 1, 2023 to July 31, 2023

CLIENT: 0018 - DeCurtis Corp.

Matter	Services	Expenses	Total
0002 - DeCurtis Restructuring	1,212,555.00	44,354.55	1,256,909.55
Total for Services and Expenses			<u>\$1,256,909.55</u>

PAYMENT IN U.S. DOLLARS MAY BE MADE BY WIRE TRANSFER TO OUR ACCOUNT NO.
9883467806 AT M&T BANK, 115 SOUTH RIDGE ST.,
RYE BROOK, NY 10573, ROUTING NUMBER: 022000046

CHARGES WHICH HAVE NOT BEEN RECORDED AS OF THE ABOVE DATE WILL BE
INVOICED LATER.

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Re: 0002 DeCurtis Restructuring

Date				Hours	Amount	
07/01/23						
	ACP	L440	A103	Draft portions of inserts for pretrial order.	0.60	726.00
07/02/23						
	NPG	L120	A101	Work on ownership issues including preparation for response to Carnival brief [0.5].	0.50	1,012.50
	NPG	L120	A101	Email re pending discovery requests [0.1].	0.10	202.50
07/03/23						
	ACP	L210	A103	Draft portions of response to complaint.	3.00	3,630.00
	ACP	L120	A107	Attend meet and confer regarding discovery.	0.40	484.00
	ACP	L120	A105	Email summary of meet and confer to N. Groombridge, J. Wu, and D. Klein.	0.20	242.00
07/04/23						
	ACP	L210	A103	Draft portions of response to answer.	1.40	1,694.00
07/05/23						
	ACP	L120	A101	Email N. Groombridge, J. Wu, D. Klein, and B. Shrievs (Carnival counsel) regarding depositions.	0.20	242.00
	ACP	L430	A101	Prepare pretrial order inserts.	1.40	1,694.00
	ACP	L430	A104	Review portions of combined filing on ownership, injunctive relief, and free and clear dispute.	0.30	363.00
	ACP	L120	A101	Email in response to N. Groombridge regarding Carnival's filings.	0.10	121.00
	NPG	L120	A101	Work on ownership issues and	2.50	5,062.50

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Date				Hours	Amount
07/05/23			preparation for evidentiary hearing [2.5].		
	NPG	L120	A104	Review Carnival brief and adversary complaint [0.7].	0.70 1,417.50
	ACP	L120	A103	Draft task list for case team (0.6).	0.60 726.00
	ACP	L120	A101	Compile materials for hearing (1.0).	1.00 1,210.00
07/06/23					
	ACP	L120	A101	Emails regarding response to Carnival's filings and redactions to the same.	0.80 968.00
	ACP	L430	A104	Draft outline based on analysis of Carnival's combined brief.	8.40 10,164.00
	ACP	L310	A104	Review responses to discovery request to provide feedback to Proskauer.	0.50 605.00
	ACP	L120	A107	Correspond regarding depositions (0.4).	0.40 484.00
	JHW	L430	A104	Analyze and review Carnival responsive ownership brief.	1.40 2,835.00
	JHW	L120	A105	Conference with N. Groombridge, D. Klein, A. Penfield, K. Bersani, C. Wu, and B. Hsu regarding legal strategy and preparation for trial.	1.00 2,025.00
	ACP	L250	A103	Revise inserts to pretrial order.	1.20 1,452.00
	ACP	L120	A101	Prepare for meeting regarding strategy for responses (0.1).	0.10 121.00
	ACP	L120	A109	Attend team meeting with J. Wu, D. Klein, B. Hsu, C. Wu, and K. Bersani regarding strategy for response to opposition regarding ownership and preparation for trial (1.4).	1.40 1,694.00

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Date				Hours	Amount
07/06/23					
	NPG	L120	A104	Further review of Carnival brief and supporting filings [0.9].	0.90 1,822.50
	NPG	L120	A105	Prepare for evidentiary hearing including call with team re same [1.7].	1.70 3,442.50
	KNB	L120	A105	Meet with N. Groombridge, J.H. Wu, A. Pennfield, B. Hsu, and C. Wu to plan strategy for combined ownership brief reply.	1.30 955.50
	KNB	L250	A105	Analyze Carnival combined brief in opposition.	1.00 735.00
	ACP	L120	A104	Review deposition topics (0.2).	0.20 242.00
	ACP	L120	A107	Email regarding filings and case strategy (0.8).	0.80 968.00
	ACP	L120	A107	Discuss strategy with B. Shrieves (Carnival counsel) (0.2).	0.20 242.00
07/07/23					
	JHW	L430	A103	Revise outline to reply brief on ownership issues with A. Penfield.	3.40 6,885.00
	JHW	L120	A107	Conference with E. Lazerowitz (Cooley), B. Shrieves (Carnival counsel), N. Groombridge, D. Klein, A. Penfield, K. Bersani, C. Wu, and B. Hsu regarding pretrial depositions and replies to Carnival's ownership brief.	0.50 1,012.50
	ACP	L120	A107	Attend meet and confer regarding discovery.	0.30 363.00
	ACP	L440	A101	Attend call regarding trial preparation and preparation of responsive papers due July 12.	0.50 605.00
	ACP	L120	A101	Prepare for evidentiary hearing, including emails related to trial prep (1.5).	1.50 1,815.00

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Date				Hours	Amount
07/07/23					
JHW	L120	A106	Conference with D. Fournier (DeCurtis), J. Carino (DeCurtis), E. Lazerowitz (Cooley), B. Shrievs, and K. Bersani in preparation for trial testimony.	0.80	1,620.00
ACP	L430	A103	Draft portions of opposition-reply brief (7.5).	7.50	9,075.00
ACP	L120	A101	Attend meeting with client regarding brief (0.6).	0.60	726.00
KNB	L250	A107	Meet between bankruptcy counsel at Cooley and Groombridge Wu litigation team to coordinate draft reply to Carnival's combined brief in opposition.	0.50	367.50
KNB	L250	A106	Meet between client to discuss combined reply brief and declarations.	0.70	514.50
NPG	L120	A103	Email re witness list [0.3].	0.30	607.50
NPG	L120	A104	Review Carnival brief and work on response to same including call with team [2.1].	2.10	4,252.50
ACP	L120	A103	Draft outline for opposition-reply brief (3.0).	3.00	3,630.00
07/08/23					
ACP	L330	A107	Correspond regarding deposition notices for J. Padgett and E. de la Iglesia.	0.30	363.00
ACP	L250	A103	Draft injunction brief insert.	9.70	11,737.00
JHW	L250	A103	Revise injunction portion of reply ownership brief with A. Penfield.	4.20	8,505.00
07/09/23					
ACP	L250	A103	Revise pretrial order inserts (1.4).	1.40	1,694.00
NPG	L120	A104	Review comments on Carnival	1.10	2,227.50

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Date			Hours	Amount
07/09/23		brief and prepare for hearing [1.1].		
	CWW L430	A103 Draft Debtors' reply brief section regarding contractual provisions for injunctive relief.	0.50	400.00
	CWW L430	A103 Draft Debtors' reply brief section regarding injunctive relief.	1.00	800.00
	KNB L250	A103 Draft analysis of legal standard for combined reply brief.	1.10	808.50
	KNB L250	A103 Revise joint pre-hearing order proposal.	2.50	1,837.50
	ACP L120	A103 Revise insert for injunction based on comments from J. Wu (1.5).	1.50	1,815.00
	ACP L120	A103 Draft insert on ownership for brief (8.3).	8.30	10,043.00
07/10/23				
	ACP L430	A103 Revise pretrial order inserts based on comments from E. Lazerowitz (Cooley), K. Bersani, and N. Groombridge.	1.50	1,815.00
	ACP L440	A101 Email regarding questions from client related to trial and to declaration in support of combined brief.	0.50	605.00
	JHW L250	A103 Conference with Carnival counsel regarding pretrial issues.	0.50	1,012.50
	JHW L440	A105 Draft trial materials including slides for trial, with K. Bersani, C. Wu, and B. Hsu.	3.20	6,480.00
	JHW L440	A105 Correspond with K. Bersani regarding confidentiality issues and proposed redactions.	0.20	405.00
	JHW L250	A106 Correspond with D. Fournier (DeCurtis) and A. Penfield	0.30	607.50

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Date				Hours	Amount	
07/10/23			regarding reply declarations.			
	NPG	L120	A107	Prepare for and participate in meet-and-confer call with Carnival counsel [0.7].	0.70	1,417.50
	NPG	L120	A108	Further preparation for evidentiary hearing including call with S. Minyailov [1.1].	1.10	2,227.50
	KNB	L250	A103	Revise supplemental declaration of D. Fournier (DeCurtis).	5.60	4,116.00
	SOS	L440	A111	Compile all exhibits cited in Carnival Corp's brief per A. Penfield's request.	1.20	522.00
	ACP	L430	A103	Draft portions of combined reply brief.	9.30	11,253.00
	ACP	L110	A108	Attend meeting with D. Fournier (DeCurtis) and N. Groombridge regarding reply brief.	0.50	605.00
	ACP	L120	A109	Attend meet and confer with opposing counsel regarding depositions (0.4).	0.40	484.00
	BH	L120	A101	Confer with J. Wu, C. Wu, and K. Bersani regarding opening slides.	0.50	400.00
	BH	L120	A101	Analyze arguments and case law regarding property ownership.	1.20	960.00
	ACP	L120	A103	Draft notes to the team re depositions (0.1).	0.10	121.00
07/11/23						
	JHW	L440	A105	Draft trial materials including slides for trial, with A. Penfield, K. Bersani, C. Wu, and B. Hsu.	6.90	13,972.50
	JHW	L430	A103	Revise ownership reply brief with A. Penfield.	1.70	3,442.50
	NPG	L120	A103		1.60	3,240.00

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Date				Hours	Amount	
07/11/23			Work on reply brief and supporting declaration [1.6].			
	NPG	L120	A101	Prepare for evidentiary hearing [0.7].	0.70	1,417.50
	CWW	L440	A103	Discuss and revise opening slides for DeCurtis bankruptcy proceeding with J. Wu, K. Bersani, and B. Hsu.	1.30	1,040.00
	CWW	L430	A105	Discuss revisions for Debtors' reply brief with A. Penfield and B. Hsu.	0.50	400.00
	KNB	L250	A103	Draft combined brief in reply.	9.50	6,982.50
	ACP	L120	A105	Met with J. Wu, K. Bersani, B. Hsu, and C. Wu regarding slides for opening (1.3).	1.30	1,573.00
	ACP	L430	A103	Revise portions of Fournier declaration.	4.20	5,082.00
	ACP	L120	A106	Email with D. Fournier (DeCurtis) regarding his declaration (0.1).	0.10	121.00
	ACP	L430	A104	Revise portions of reply brief.	3.60	4,356.00
	ACP	L430	A103	Revise declaration for J. Learish (DeCurtis).	1.20	1,452.00
	BH	L120	A101	Draft opening slides.	1.70	1,360.00
	BH	L120	A101	Confer with J. Wu., C. Wu, and K. Bersani regarding opening slides.	1.30	1,040.00
	BH	L120	A101	Revise opening slides.	1.60	1,280.00
	BH	L120	A101	Confer with A. Penfield and C. Wu regarding brief.	0.50	400.00
	ACP	L120	A109	Attend post hearing briefing discussion with K. Bersani, E. Lazerowitz (Cooley), and K. Good	0.30	363.00

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Date				Hours	Amount	
07/11/23			(Potter Anderson) (0.3).			
	ACP	L120	A105	Discuss brief with J. Wu, K. Bersani, B. Hsu, and C. Wu (0.5).	0.50	605.00
07/12/23	JHW	L430	A103	Revise ownership reply brief with A. Penfield and C.W. Wu.	5.40	10,935.00
	JHW	L430	A103	Revise Answer to Adversary Complaint.	1.70	3,442.50
	JHW	L440	A105	Draft trial materials including slides for trial, with A. Penfield, K. Bersani, C. Wu, and B. Hsu.	1.60	3,240.00
	JHW	L410	A106	Conference with D. Fournier (DeCurtis), N. Groombridge, and A. Penfield in preparation for trial and deposition testimony.	2.00	4,050.00
	JHW	L410	A106	Conference with J. Carino (DeCurtis), E. Lazerowitz (Cooley), B. Shrieves, and B. Hsu in preparation for trial and deposition testimony.	1.50	3,037.50
	BBP	L250	A104	Review and analyze reply brief re ownership, prepare exhibits thereto for attorney review and filing with court.	1.00	475.00
	CWW	L430	A103	Revise Debtors' reply brief.	1.50	1,200.00
	KNB	L250	A103	Draft combined brief in reply.	7.40	5,439.00
	KNB	L250	A103	Draft declaration of J. Learish (DeCurtis).	4.20	3,087.00
	KNB	L330	A106	Deposition preparation with D. Fournier (DeCurtis).	2.00	1,470.00
	SOS	L210	A111	Cite check DeCurtis Inc.'s Reply Brief per Chih-wei Wu's request.	6.50	2,827.50
	SOS	L210	A111		1.50	652.50

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Date				Hours	Amount	
07/12/23			Edit and compile exhibits cited in DeCurtis Inc.'s Reply Brief.			
	ACP	L330	A101	Meet with D. Fournier (DeCurtis) regarding deposition.	2.00	2,420.00
	ACP	L440	A101	Attend team meeting regarding trial preparation.	0.40	484.00
	ACP	L210	A103	Revise adversary complaint.	2.50	3,025.00
	ACP	L440	A103	Revise slide presentation for opening statement with B. Hsu.	3.60	4,356.00
	ACP	L250	A103	Revised brief and declarations in preparation for filing.	5.50	6,655.00
	ACP	L250	A101	Coordinate regarding filing of brief and declarations.	0.60	726.00
	BH	L120	A101	Finalize reply brief for filing.	5.20	4,160.00
	BH	L120	A101	Revise opening slides with A. Penfield.	3.60	2,880.00
	BH	L120	A101	Confer with J. Wu, C. Wu, and K. Bersani regarding opening slides.	0.80	640.00
	NPG	L460	A103	Work on combined reply brief on ownership and injunction issues [1.5].	1.50	3,037.50
	NPG	L120	A104	Review draft supplemental Fournier declaration [0.2].	0.20	405.00
	NPG	L120	A103	Review and revise draft answer to adversary complaint [0.6].	0.60	1,215.00
	NPG	L120	A108	Email re depositions [0.3].	0.30	607.50
	NPG	L120	A101	Prepare for trial including work on Fournier examination [1.1].	1.10	2,227.50
07/13/23	JHW	L330	A106	Meet with D. Fournier (DeCurtis)	2.20	4,455.00

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Date				Hours	Amount	
07/13/23			in preparation for deposition, with A. Penfield and K. Bersani.			
	JHW	L330	A105	Correspond with N. Groombridge, D. Klein, A. Penfield, and K. Bersani regarding deposition of J. Padgett.	0.50	1,012.50
	JHW	L330	A109	Attend deposition of DeCurtis corporate witness J. Carino (DeCurtis).	3.10	6,277.50
	JHW	L440	A105	Draft trial materials including slides for trial, with A. Penfield, K. Bersani, C. Wu, and B. Hsu.	2.80	5,670.00
	NPG	L120	A101	Prepare for Padgett deposition [0.5].	0.50	1,012.50
	NPG	L120	A101	Preparation for D. Fournier deposition including calls with witness [0.8].	0.80	1,620.00
	CWW	L440	A105	Discuss trial preparation and strategy with A. Penfield.	0.50	400.00
	CWW	L440	A105	Strategize trial and depositions with A. Penfield, K. Bersani, and B. Hsu.	0.50	400.00
	CWW	L330	A101	Prepare for deposition of J. Padgett (Carnival).	2.50	2,000.00
	CWW	L330	A101	Prepare for D. Fournier (DeCurtis) deposition.	2.00	1,600.00
	CWW	L440	A103	Draft opening slides.	0.80	640.00
	CWW	L440	A101	Prepare materials for D. Fournier (DeCurtis) direct examination and J. Padgett (Carnival) cross-examination.	2.00	1,600.00
	ACP	L330	A109	Attend D. Fournier (DeCurtis) deposition prep (2.7).	2.70	3,267.00

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Date				Hours	Amount
07/13/23					
	ACP	L440	A101	Attend trial planning meeting.	0.50 605.00
	KNB	L330	A106	Deposition preparation with D. Fournier (DeCurtis).	4.70 3,454.50
	KNB	L250	A103	Revise draft joint pre-hearing order.	1.80 1,323.00
	KNB	L440	A103	Revise demonstratives for opening statement in evidentiary hearing.	1.80 1,323.00
	SOS	L440	A105	DeCurtis trial logistics meeting with trial team and co counsel.	0.50 217.50
	ACP	L440	A101	Prepare for trial.	5.50 6,655.00
	BH	L120	A101	Revise opening slides.	2.70 2,160.00
	BH	L120	A101	Attend deposition preparation session with D. Fournier (DeCurtis).	2.20 1,760.00
	BH	L120	A101	Confer with A. Penfield, C. Wu, and K. Bersani regarding trial plans.	0.50 400.00
	BH	L110	A101	Review materials and prepare for trial.	2.90 2,320.00
	ACP	L120	A109	Attend deposition prep with D. Fournier (DeCurtis) and J. Learish (DeCurtis) (0.5).	0.50 605.00
	ACP	L120	A109	Attend deposition of J. Carino (DeCurtis) (3.2).	3.20 3,872.00
07/14/23					
	JHW	L330	A109	Defend deposition of D. Fournier (DeCurtis).	5.50 11,137.50
	JHW	L330	A106	Meet with J. Learish (DeCurtis) in preparation for deposition, with A. Penfield, C.W. Wu, K. Bersani, and B. Hsu.	2.50 5,062.50
	JHW	L440	A103		1.40 2,835.00

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Date			Hours	Amount
07/14/23		Draft trial materials including slides for trial with A. Penfield, K. Bersani, C. Wu, and B. Hsu.		
JHW	L440	A105	Meet with A. Penfield, C.W. Wu, K. Bersani, and B. Hsu to discuss legal strategy in preparation for trial.	0.50 1,012.50
NPG	L120	A101	Prepare for evidentiary hearing [1.1].	1.10 2,227.50
NPG	L330	A101	Prepare for and take Padgett deposition [1.7].	1.70 3,442.50
NPG	L330	A105	Email and calls with team re D. Fournier deposition [0.8].	0.80 1,620.00
CWW	L330	A101	Prepare exhibits and materials for J. Padgett deposition.	1.10 880.00
CWW	L440	A105	Discuss trial strategy with A. Penfield, K. Bersani, and B. Hsu.	1.00 800.00
CWW	L440	A101	Prepare direct examination materials for D. Fournier (DeCurtis) and J. Learish (DeCurtis).	1.00 800.00
CWW	L330	A101	Prepare for J. Learish (DeCurtis) and E. de la Iglesia depositions.	2.00 1,600.00
ACP	L330	A109	Attend deposition prep for D. Fournier (DeCurtis) (1.0).	1.00 1,210.00
ACP	L120	A107	Attend meet and confer regarding pretrial order.	0.30 363.00
ACP	L440	A101	Discuss trial preparation with C. Wu, K. Bersani, and B. Hsu.	0.80 968.00
ACP	L440	A101	Draft proposed direct topics by witness.	2.50 3,025.00
ACP	L440	A101	Prepare for trial including	0.50 605.00

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Date				Hours	Amount	
07/14/23			collection documents for prep kits and corresponding with case team regarding trial materials.			
	KNB	L440	A103	Revise demonstratives for opening statement in evidentiary hearing.	2.50	1,837.50
	KNB	L330	A106	Deposition preparation with D. Fournier (DeCurtis).	1.00	735.00
	BH	L120	A101	Prepare for trial with J. Wu.	2.00	1,600.00
	ACP	L120	A105	Attend discussions regarding depositions with case team (1.5).	1.50	1,815.00
	ACP	L120	A109	Attend deposition prep of J. Learish (DeCurtis) (2.0).	2.00	2,420.00
	ACP	L120	A109	Attend deposition of D. Fournier (DeCurtis) (4.5).	4.50	5,445.00
07/15/23						
	NPG	L120	A101	Prepare for evidentiary hearing [0.8].	0.80	1,620.00
	JHW	L420	A104	Analyze Carnival expert witness declaration for trial, with N. Groombridge, A. Penfield, and K. Bersani.	1.20	2,430.00
	JHW	L410	A104	Analyze fact testimony for trial from DeCurtis witnesses, with A. Penfield.	2.30	4,657.50
	JHW	L430	A103	Revise Joint Pretrial Order, with C.W. Wu.	1.60	3,240.00
	JHW	L440	A103	Revise trial materials including slides for trial, with A. Penfield, K. Bersani, C.W. Wu, and B. Hsu.	2.10	4,252.50
	CWW	L430	A103	Draft pretrial exchanges with Carnival.	0.40	320.00
	CWW	L430	A103	Draft fact and legal standard	3.00	2,400.00

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Date				Hours	Amount	
07/15/23			sections of pretrial order.			
	CWW	L430	A105	Discuss pretrial order disputed facts with J. Wu.	0.50	400.00
	CWW	L430	A103	Revise pretrial order.	1.00	800.00
	CWW	L440	A101	Prepare materials for D. Fournier (DeCurtis) direct and cross-examinations.	2.00	1,600.00
	CWW	L330	A101	Prepare materials for E. de la Iglesia deposition.	1.00	800.00
	CWW	L440	A107	Discuss trial strategy and preparation with E. Lazerowitz (Cooley), B. Shrieves (Carnival counsel), K. Bersani, and B. Hsu.	0.50	400.00
	KNB	L440	A103	Revise demonstratives for opening statement in evidentiary hearing.	6.10	4,483.50
	SOS	L440	A111	Edit DeCurtis Inc's exhibit list to reflect entries in opening statement per K. Bersani's request.	4.50	1,957.50
	SOS	L440	A111	Compile materials cited in de la Iglesia's declaration per K. Bersani's request.	2.00	870.00
	BH	L120	A101	Confer with cocounsel regarding trial strategy.	0.50	400.00
	BH	L120	A101	Revise opening slides.	3.00	2,400.00
	BH	L120	A101	Review materials and prepare for trial.	1.60	1,280.00
07/16/23						
	JHW	L430	A104	Revise Joint Pretrial Order, with C.W. Wu.	1.40	2,835.00
	JHW	L440	A103	Revise trial materials including slides for trial, with K. Bersani,	6.70	13,567.50

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Date				Hours	Amount
07/16/23			C.W. Wu, and B. Hsu.		
JHW	L440	A105	Conference with N. Groombridge, K. Bersani, C.W. Wu, and B. Hsu regarding trial strategy.	2.90	5,872.50
NPG	L120	A101	Prepare for trial including work on pending statement and conference with team re strategy [7.6].	7.60	15,390.00
NPG	L120	A101	Prepare for De la Iglesia deposition [4.5].	4.50	9,112.50
CWW	L440	A105	Discuss trial strategy with N. Groombridge, J. Wu, K. Bersani, and B. Hsu.	2.00	1,600.00
CWW	L440	A107	Discuss trial strategy and preparation with E. Lazerowitz (Cooley), B. Shrieves (Carnival counsel), K. Bersani, and B. Hsu.	0.30	240.00
CWW	L440	A103	Revise opening slides.	0.50	400.00
CWW	L440	A103	Draft exhibit list for trial.	0.40	320.00
CWW	L440	A101	Prepare materials and binders for opening statement, cross-examination for E. de la Iglesia, and direct examination of D. Fournier (DeCurtis) and J. Learish (DeCurtis).	6.00	4,800.00
CWW	L440	A103	Revise pretrial order.	1.80	1,440.00
ACP	L440	A101	Draft response to opposing counsel regarding pre-trial order (0.3).	0.30	363.00
SOS	L440	A111	Compile materials in preparation for D. Fournier's (DeCurtis) testimony per Chih-wei Wu's request.	4.50	1,957.50
SOS	L440	A111		2.50	1,087.50

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Date				Hours	Amount
07/16/23			Compile materials cited in DeCurtis Inc's Opening and Reply Briefs per Chih-wei Wu's request.		
SOS	L440	A111	Confer with Ms. L. Huber regarding exhibit identification and edit and update trial exhibit list.	2.50	1,087.50
BBP	L440	A104	Review and analyze trial exhibits, prepare same for attorney review and submission with the Pre-trial order.	13.00	6,175.00
KNB	L440	A103	Prepare exhibit list.	4.00	2,940.00
KNB	L440	A103	Revise draft joint pretrial order.	3.50	2,572.50
KNB	L440	A105	Meet with Groombridge Wu litigation team to discuss trial strategy.	2.00	1,470.00
KNB	L440	A104	Prepare for deposition of E. de la Iglesia.	2.30	1,690.50
BH	L120	A101	Confer with co-counsel regarding trial strategy.	0.20	160.00
BH	L120	A101	Revise opening slides.	1.00	800.00
BH	L120	A101	Confer with C. Wu and K. Bersani regarding exhibit list.	1.30	1,040.00
BH	L120	A101	Review, compile, and organize materials for trial.	4.00	3,200.00
BH	L120	A101	Confer with N. Groombridge, J. Wu, C. Wu., and K. Bersani regarding trial strategy.	2.00	1,600.00
BH	L120	A101	Prepare materials for trial.	2.00	1,600.00
ACP	L120	A103	Revise pre-trial order (0.3).	0.30	363.00
ACP	L120	A105	Correspond with case team regarding pre-trial order revisions	0.10	121.00

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Date				Hours	Amount
07/16/23			(0.1).		
	ACP	L120	A107	Send response to opposing counsel regarding pre-trial order (0.1).	0.10 121.00
07/17/23	JHW	L430	A103	Revise Joint Pretrial Order, with K. Bersani and C.W. Wu.	1.90 3,847.50
	JHW	L410	A109	Defend J. Learish (DeCurtis) at deposition.	1.00 2,025.00
	JHW	L450	A106	Meet with D. Fournier (DeCurtis), J. Learish (DeCurtis), N. Groombridge, K. Bersani, C.W. Wu, and B. Hsu regarding legal strategy in preparation for trial.	3.30 6,682.50
	JHW	L450	A109	Attend Pretrial Conference.	0.50 1,012.50
	JHW	L450	A106	Revise trial materials including slides for trial, with N. Groombridge, K. Bersani, C.W. Wu, and B. Hsu.	2.90 5,872.50
	JHW	L450	A106	Conference with D. Fournier (DeCurtis), J. Learish (DeCurtis), C. Speckhart (Cooley), E. Lazerowitz (Cooley), and N. Groombridge regarding legal strategy in preparation for trial.	1.70 3,442.50
	JHW	L450	A104	Prepare materials for trial direct examinations of D. Fournier (DeCurtis) and J. Learish (DeCurtis).	1.80 3,645.00
	JHW	L450	A106	Meet with D. Fournier (DeCurtis), J. Learish (DeCurtis), and A. Saxena in preparation for trial testimony.	2.60 5,265.00
	JHW	L450	A109	Meet with D. Fournier (DeCurtis), J. Learish (DeCurtis), and N.	0.50 1,012.50

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Date			Hours	Amount
07/17/23		Groombridge regarding debrief from Pretrial Conference.		
CWW L440	A103	Revise pretrial order to incorporate opposing counsel and co-counsel inserts.	4.50	3,600.00
CWW L330	A101	Prepare for E. de la Iglesia deposition.	1.50	1,200.00
CWW L450	A101	Prepare binders and materials for J. Learish (DeCurtis) direct examination.	4.00	3,200.00
CWW L450	A101	Prepare materials and binders for J. Padgett cross-examination.	3.00	2,400.00
CWW L440	A103	Revise opening slides.	1.00	800.00
CWW L440	A104	Analyze Carnival reply brief for arguments during trial.	0.80	640.00
CWW L440	A101	Prepare documents for production that appear on the exhibit list.	0.30	240.00
CWW L440	A101	Discuss trial strategy with Groombridge Wu team and client.	1.00	800.00
ACP L440	A103	Draft objections to exhibit list.	1.00	1,210.00
ACP L120	A105	Correspond with B. Hsu, C. Wu, A. Stulman (Potter Anderson), and K. Bersani regarding pretrial order.	0.20	242.00
CWW L450	A109	Attend pretrial conference.	0.50	400.00
KNB L440	A103	Prepare exhibit list.	1.70	1,249.50
KNB L440	A103	Prepare amended exhibit list with associated disclosures.	3.80	2,793.00
BBP L440	A104	Continue to review and analyze trial exhibits, prepare same for attorney review and submission with the Pre-trial order (3.0).	3.00	1,425.00

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Date				Hours	Amount	
07/17/23						
	KNB	L440	A103	Revise draft joint pretrial order.	4.50	3,307.50
	KNB	L440	A103	Revise witness disclosures.	1.00	735.00
	KNB	L440	A103	Revise opening statement demonstratives.	2.70	1,984.50
	SOS	L440	A111	Trial preparation for J. Padgett's cross testimony.	4.00	1,740.00
	SOS	L440	A111	Trial preparation for J. Learish (DeCurtis) direct testimony.	3.00	1,305.00
	SOS	L440	A111	Compile trial materials in preparation for first day of trial.	7.50	3,262.50
	KNB	L450	A109	Attend pretrial conference.	0.50	367.50
	BH	L120	A101	Attend pretrial conference.	0.50	400.00
	BH	L120	A101	Assist with trial preparations, including conferring with team regarding trial strategy, revising opening slides, preparing binders for witnesses, and reviewing materials.	15.00	12,000.00
	NPG	L330	A109	Prepare for and attend De la Iglesia deposition [4.6].	4.60	9,315.00
	NPG	L450	A109	Prepare for and attend pre-trial conference [1.9].	1.90	3,847.50
	NPG	L450	A101	Prepare for trial including work on opening statement and Padgett cross-examination, and review of Carnival opening statement slides [8.7].	8.70	17,617.50
	BBP	L120	A104	Review and analyze trial exhibits and prior testimony of DeCurtis witnesses J. Learish and D. Fournier, prepare same for attorney review in preparation of direct examination (6.0).	6.00	2,850.00

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Date				Hours	Amount
07/17/23					
	BBP	L120	A104	Review and analyze trial exhibits and prior testimony of Carnival witness Padgett, prepare same for attorney review in preparation of cross-examination (5.0).	5.00 2,375.00
	BBP	L120	A103	Review and revise presentation for opening arguments (2.0).	2.00 950.00
07/18/23					
	JHW	L450	A109	Attend trial including direct examination of J. Learish (DeCurtis).	7.20 14,580.00
	JHW	L450	A105	Meet with N. Groombridge, K. Bersani, C.W. Wu, and B. Hsu in preparation for trial.	1.60 3,240.00
	JHW	L450	A106	Meet with J. Learish (DeCurtis) in preparation for trial testimony.	1.50 3,037.50
	JHW	L450	A106	Meet with A. Saxena regarding witness declaration in preparation for deposition testimony and trial testimony.	2.90 5,872.50
	JHW	L450	A104	Analyze materials in preparation for trial.	2.20 4,455.00
	CWW	L450	A109	Attend trial.	7.20 5,760.00
	CWW	L450	A101	Prepare binders and materials for day 1 of trial.	2.50 2,000.00
	CWW	L450	A101	Prepare binders and materials for E. de la Iglesia cross-examination.	3.00 2,400.00
	CWW	L450	A101	Prepare materials and binders for D. Fournier (DeCurtis) direct examination.	2.00 1,600.00
	CWW	L440	A103	Update exhibit list for trial.	0.30 240.00
	SOS	L450	A109	Attend trial.	8.00 3,480.00
	BBP	L450	A109		8.00 3,800.00

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Date				Hours	Amount	
07/18/23			Attend trial, prepare trial exhibits for attorney review and presentation to court.			
	KNB	L440	A103	Prepare amended exhibit list with associated disclosures.	2.50	1,837.50
	KNB	L440	A103	Draft amended pretrial order to resolve parties' competing forms.	2.00	1,470.00
	BBP	L440	A104	Review and analyze trial exhibits, prepare same for attorney review and submission with the amended Pre-trial order (2.0).	2.00	950.00
	KNB	L450	A109	Attend trial.	6.50	4,777.50
	SOS	L440	A111	Trial preparation for D. Fournier's (DeCurtis) direct testimony.	5.00	2,175.00
	SOS	L440	A111	Trial preparation for E. de la Iglesia's cross testimony.	3.00	1,305.00
	SOS	L440	A111	Compile trial materials in preparation for second day of trial.	2.00	870.00
	BH	L120	A101	Attend trial.	8.00	6,400.00
	BH	L120	A101	Assist with trial preparations, including conferring with team regarding trial strategy, preparing binders for witnesses, and reviewing materials.	8.00	6,400.00
	NPG	L450	A101	Prepare for opening statement and Padgett cross-examination [3.3].	3.30	6,682.50
	NPG	L450	A109	Attend trial [7.0].	7.00	14,175.00
	NPG	L450	A109	Prepare for Fournier examination and De la Iglesia cross-examination [5.2].	5.20	10,530.00
	NPG	L110	A105	Conferences with team re trial	1.00	2,025.00

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Date				Hours	Amount
07/18/23			issues [1.0].		
	BBP	L120	A104	Review and analyze trial exhibits and prior testimony of DeCurtis witnesses D. Fournier and A. Saxena, prepare same for attorney review in preparation of direct examination (1.0).	1.00 475.00
	BBP	L120	A104	Review and analyze trial exhibits and prior testimony of Carnival witness De La Iglesia, prepare same for attorney review in preparation of cross-examination (3.0).	3.00 1,425.00
	BBP	L120	A103	Review and revise presentation for opening arguments (2.0).	2.00 950.00
07/19/23					
	JHW	L450	A106	Meet with D. Fournier (DeCurtis) in preparation for trial testimony.	1.50 3,037.50
	NPG	L120	A101	Prepare for D. Fournier (DeCurtis) examination [2.5].	2.50 5,062.50
	NPG	L120	A101	Prepare for E. De Iglesia cross-examination [2.0].	2.00 4,050.00
	NPG	L450	A109	Attend trial [8.0].	8.00 16,200.00
	NPG	L120	A101	Prepare for A. Saxena examination [0.4].	0.40 810.00
	NPG	L120	A101	Work on case strategy [1.3].	1.30 2,632.50
	CWW	L450	A109	Attend trial.	8.00 6,400.00
	CWW	L440	A101	Prepare binders for D. Fournier (DeCurtis) direct examination.	2.00 1,600.00
	CWW	L440	A101	Prepare materials and binders for A. Saxena direct examination.	2.00 1,600.00
	CWW	L440	A103	Update exhibit list for trial.	0.60 480.00

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Date				Hours	Amount
07/19/23					
JHW	L450	A106	Meet with A. Saxena in preparation for deposition and trial testimony.	4.20	8,505.00
JHW	L450	A109	Attend trial.	8.00	16,200.00
SOS	L450	A109	Attend trial.	8.00	3,480.00
BBP	L450	A109	Continue to attend trial, prepare trial exhibits for attorney review and presentation to court.	9.00	4,275.00
KNB	L440	A103	Prepare amended exhibit list with associated disclosures.	3.00	2,205.00
KNB	L440	A103	Draft amended pretrial order to resolve parties' competing forms.	1.10	808.50
BBP	L440	A104	Continue to review and analyze trial exhibits, prepare same for attorney review and submission with the amended Pre-trial order (1.0).	1.00	475.00
KNB	L450	A109	Attend trial.	8.00	5,880.00
SOS	L440	A111	Trial preparation for A. Saxena's rebuttal testimony.	3.00	1,305.00
SOS	L440	A111	Compile trial materials in preparation for third day of trial.	3.00	1,305.00
BH	L120	A101	Attend trial.	9.00	7,200.00
BH	L120	A101	Assist with trial preparations, including conferring with team regarding trial strategy, preparing binders for witnesses, and reviewing materials.	8.00	6,400.00
BBP	L120	A104	Continue to review and analyze trial exhibits and prior testimony of DeCurtis witness A. Saxena, prepare same for attorney review in preparation of direct	4.00	1,900.00

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Date				Hours	Amount	
07/19/23			examination (4.0).			
	BBP	L120	A104	Continue to review and analyze trial exhibits and prior testimony of Carnival witness E. De La Iglesia, prepare same for attorney review in preparation of cross-examination (2.0).	2.00	950.00
07/20/23						
	CWW	L450	A109	Attend trial.	7.00	5,600.00
	CWW	L330	A109	Attend deposition of A. Saxena.	1.30	1,040.00
	CWW	L440	A103	Update exhibit list for trial and analyze admitted exhibits.	0.50	400.00
	JHW	L410	A106	Defend deposition of A. Saxena.	1.20	2,430.00
	JHW	L450	A109	Attend trial including direct examination of A. Saxena.	7.10	14,377.50
	JHW	L450	A106	Meet with A. Saxena in preparation for deposition and trial testimony.	1.40	2,835.00
	NPG	L450	A109	Attend trial [4.2].	4.20	8,505.00
	NPG	L430	A103	Begin work on proposed findings of fact and conclusions of law [2.0].	2.00	4,050.00
	SOS	L450	A109	Attend trial.	7.50	3,262.50
	BBP	L450	A109	Continue to attend trial, prepare trial exhibits for attorney review and presentation to court.	7.30	3,467.50
	BBP	L440	A104	Continue to review and analyze trial exhibits, prepare same for attorney review (3.0).	3.00	1,425.00
	KNB	L450	A109	Attend trial.	6.30	4,630.50
	BH	L120	A101	Attend trial.	7.00	5,600.00

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Date				Hours	Amount	
07/20/23						
	BH	L120	A101	Confer with N. Groombridge and J. Wu regarding post trial briefing strategy.	0.50	400.00
	BBP	L120	A104	Continue to review and analyze trial exhibits and prior testimony of DeCurtis witness A. Saxena, prepare same for attorney review in preparation of direct examination (3.2).	3.20	1,520.00
	BBP	L120	A104	Continue to review and analyze trial exhibits and prior testimony of Carnival witness E. De La Iglesia, prepare same for attorney review in preparation of cross-examination (2.5).	2.50	1,187.50
07/21/23						
	CWW	L460	A101	Analyze trial transcripts for post-trial briefing.	0.80	640.00
	JHW	L460	A105	Conference with N. Groombridge and K. Bersani regarding post-trial briefing.	1.70	3,442.50
	JHW	L460	A104	Analyze trial transcripts and exhibits for post-trial briefing.	1.90	3,847.50
	NPG	L120	A103	Work on post-trial submissions including conferences with team re same [4.3].	4.30	8,707.50
	BBP	L440	A104	Review and analyze trial transcripts and admitted trial exhibits, prepare same for attorney review.	10.30	4,892.50
07/22/23						
	CWW	L460	A104	Analyze trial transcripts for citations for post-trial briefing.	1.30	1,040.00
	KNB	L460	A103	Draft post-trial brief.	5.30	3,895.50
	NPG	L460	A103	Work on post-trial submissions	2.30	4,657.50

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Date				Hours	Amount
07/22/23		including review of trial transcript [2.3].			
07/23/23	CWW L460	A104	Analyze trial transcripts for Debtors' post-trial briefing.	2.50	2,000.00
	KNB L460	A103	Draft post-trial brief.	4.20	3,087.00
	NPG L460	A103	Further work on post-trial submissions including review of trial transcript [2.1].	2.10	4,252.50
07/24/23	JHW L460	A104	Analyze trial transcripts and exhibits for post-trial briefing.	2.40	4,860.00
	JHW L460	A104	Analyze deposition designations with K. Bersani.	1.10	2,227.50
	JHW L460	A107	Conference with E. Lazerowitz (Cooley), A. Stulman (Potter Anderson), M. Klein, K. Good (Potter Anderson), A. Penfield, C.W. Wu, B. Hsu, and B. Pound.	0.50	1,012.50
	JHW L460	A105	Draft email to opposing counsel regarding the record.	0.20	405.00
	CWW L460	A103	Draft post-trial findings of fact.	0.80	640.00
	CWW L120	A107	Trial debrief with Groombridge Wu, Cooley, and Potter Anderson teams.	0.50	400.00
	CWW L460	A105	Plan and strategize post-trial briefing with A. Penfield, K. Bersani, and B. Hsu.	0.50	400.00
	ACP L460	A104	Review and analyze trial record to prepare for post trial briefing.	9.60	11,616.00
	ACP L120	A101	Discuss post trial submissions with members of GWBS and Cooley teams.	1.50	1,815.00

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Date				Hours	Amount	
07/24/23						
	KNB	L460	A103	Draft post-trial brief.	5.00	3,675.00
	KNB	L460	A103	Designate deposition excerpts from Florida Litigation.	6.50	4,777.50
	JHW	L460	A104	Analyze trial transcripts and exhibits for post-trial briefing.	2.40	4,860.00
	BH	L120	A101	Confer with cocounsel regarding post trial strategy.	0.50	400.00
	BH	L120	A101	Review trial and strategize post trial briefings.	0.80	640.00
	BH	L120	A101	Draft post trial briefings.	3.00	2,400.00
	NPG	L460	A103	Further work on post-trial submissions including review of trial transcript and exhibits [1.5].	1.50	3,037.50
	NPG	L460	A104	Email re submission of deposition excerpts [0.2].	0.20	405.00
07/25/23						
	CWW	L460	A105	Discuss post-trial briefings with N. Groombridge, A. Penfield, K. Bersani, B. Hsu, and B. Pound.	1.40	1,120.00
	CWW	L460	A104	Review trial transcripts for findings of fact.	0.50	400.00
	CWW	L460	A103	Draft post-trial findings of fact.	9.50	7,600.00
	CWW	L460	A103	Draft post-trial conclusions of law.	1.60	1,280.00
	ACP	L460	A103	Draft sections of post-trial brief (14.0).	14.00	16,940.00
	KNB	L460	A103	Draft post-trial brief.	13.00	9,555.00
	KNB	L460	A105	Discuss post-trial brief and record with N. Groombridge, A. Pennfield, Cw. Wu, B. Hsu.	1.40	1,029.00
	BH	L120	A101	Draft proposed findings of facts.	8.50	6,800.00

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Date				Hours	Amount	
07/25/23						
	BH	L120	A101	Confer with N. Groombridge, J. Wu, A. Penfield, C. Wu, and K. Bersani regarding post trial briefing.	1.50	1,200.00
	BH	L120	A101	Draft post trial brief.	2.50	2,000.00
	NPG	L460	A104	Review trial transcript in connection with post-trial submissions [1.4].	1.40	2,835.00
	ACP	L120	A105	Attend call with N. Groombridge, K. Bersani, C. Wu, and B. Hsu regarding brief (1.5).	1.50	1,815.00
07/26/23						
	ACP	L460	A103	Revise findings of fact (1.4).	1.40	1,694.00
	ACP	L460	A103	Revise portions of injunction section of brief.	2.10	2,541.00
	BH	L120	A101	Resolve confidentiality issue regarding unsealed document.	1.50	1,200.00
	CWW	L460	A103	Draft post-trial findings of fact.	2.30	1,840.00
	CWW	L460	A103	Draft post-trial conclusions of law.	3.60	2,880.00
	CWW	L460	A104	Analyze legal issues for post-trial brief.	1.80	1,440.00
	CWW	L460	A103	Draft post-trial brief.	4.10	3,280.00
	CWW	L460	A105	Discuss strategy for post-trial briefings with K. Bersani and B. Hsu.	0.30	240.00
	NPG	L120	A105	Call with team re post-trial brief and proposed findings of fact [1.8].	1.80	3,645.00
	JHW	L460	A103	Revise post-trial briefing and findings of fact and conclusions of law, with N. Groombridge and A. Penfield.	5.60	11,340.00
	ACP	L460	A103		3.20	3,872.00

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Date				Hours	Amount
07/26/23			Revise injunction section of post-trial brief.		
	ACP	L460	A103	3.90	4,719.00
	ACP	L120	A103	1.50	1,815.00
	BH	L120	A101	0.40	320.00
	BH	L120	A101	1.40	1,120.00
	BH	L120	A101	3.60	2,880.00
	KNB	L460	A103	8.60	6,321.00
	KNB	L460	A103	5.70	4,189.50
07/27/23					
	JHW	L460	A103	10.80	21,870.00
	ACP	L460	A103	0.80	968.00
	ACP	L460	A103	1.10	1,331.00
	ACP	L460	A103	0.60	726.00
	ACP	L460	A103	0.60	726.00
	ACP	L460	A103	10.10	12,221.00

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Date				Hours	Amount	
07/27/23			adding support from the record for various statements.			
	ACP	L460	A107	Discuss exhibit list with K. Bersani and A. Stulman (Potter Anderson).	0.40	484.00
	ACP	L460	A101	Discuss exhibit list with K. Bersani.	0.60	726.00
	ACP	L120	A109	Attend meet and confer with Carnival's counsel from Orrick.	0.20	242.00
	ACP	L120	A101	Discuss meet and confer topics with K. Bersani and finalizing post-trial brief.	0.30	363.00
	CWW	L460	A104	Analyze legal issues for post-trial brief.	0.80	640.00
	CWW	L460	A103	Draft post-trial findings of fact and conclusions of law.	8.60	6,880.00
	CWW	L460	A103	Incorporate N. Groombridge comments into post-trial brief.	0.20	160.00
	CWW	L460	A103	Draft post-trial brief.	1.20	960.00
	NPG	L460	A103	Work on post-trial brief [2.9].	2.90	5,872.50
	NPG	L460	A103	Email re arrangements for filing post-trial submissions [0.2].	0.20	405.00
	BH	L120	A101	Draft proposed findings of fact.	5.20	4,160.00
	BH	L120	A101	Finalize exhibit list.	5.80	4,640.00
	BH	L120	A101	Attend call with Carnival regarding exhibit list.	0.20	160.00
	KNB	L460	A103	Draft post-trial brief.	8.50	6,247.50
	KNB	L460	A103	Draft findings of fact and conclusions of law.	8.00	5,880.00
07/28/23	JHW	L460	A103	Revise post-trial briefing and	7.30	14,782.50

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Date				Hours	Amount	
07/28/23			findings of fact and conclusions of law, with N. Groombridge and A. Penfield.			
	JHW	L460	A106	Correspond with J. Learish, D. Fournier, J. Carino, N. Groombridge, and A. Penfield regarding post-trial briefing and findings of fact and conclusions of law.	0.40	810.00
	ACP	L120	A107	Correspond with N. Groombridge and E. Lazerowitz (Cooley) re revisions (0.2).	0.20	242.00
	ACP	L460	A103	Revise findings of fact for post trial submissions.	2.70	3,267.00
	ACP	L460	A103	Finalize filings, including post-trial brief and findings of fact and conclusions of law.	7.10	8,591.00
	CWW	L460	A103	Incorporate J. Learish, D. Fournier, J. Carino, N. Groombridge, and J. Wu comments into post-trial brief and findings of fact.	0.60	480.00
	CWW	L460	A103	Revise post-trial findings of fact and conclusions of law.	1.90	1,520.00
	CWW	L460	A103	Revise post-trial brief.	0.30	240.00
	CWW	L460	A105	Discuss post-trial briefing strategy with A. Penfield and K. Bersani.	0.30	240.00
	NPG	L120	A106	Review draft exhibit list and email with team re same [0.5].	0.50	1,012.50
	NPG	L460	A103	Work on post-trial brief [2.7].	2.70	5,467.50
	NPG	L250	A103	Work on proposed findings of fact and conclusions of law [1.4].	1.40	2,835.00
	BH	L120	A101	Draft proposed findings of fact.	1.80	1,440.00

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Date				Hours	Amount	
07/28/23						
	BH	L120	A101	Finalize post trial briefings.	6.20	4,960.00
	KNB	L460	A103	Finalize post-trial brief and findings of fact and conclusions of law	10.20	7,497.00
07/29/23						
	NPG	L120	A104	Review Carnival and Invictus post-trial submissions [1.2].	1.20	2,430.00
07/31/23						
	JHW	L460	A107	Correspond with E. Lazerowitz (Cooley) regarding confidentiality issues.	0.10	202.50

Summary of Services

		Rate	Hours	Amount
KNB	Kyle N. Bersani	735.00	185.50	136,342.50
NPG	Nicholas P. Groombridge	2,025.00	110.10	222,952.50
BH	Ben Hsu	800.00	141.20	112,960.00
SOS	Sayem Osman	435.00	79.70	34,669.50
ACP	Allison C. Penfield	1,210.00	186.80	226,028.00
BBP	Bernie Pound	475.00	88.30	41,942.50
CWW	Chih-wei Wu	800.00	136.00	108,800.00
JHW	Jennifer H. Wu	2,025.00	162.40	328,860.00

Total for Services **1,090.00 \$1,212,555.00**

Date	Expenses	Amount
07/01/23	Online research - Westlaw	5,508.37
07/01/23	Online research - Lexis	157.08
07/01/23	Online research - Pacer	180.40
07/31/23	Litigation support vendors - Veritext	1,164.00
07/31/23	Litigation support vendors - Veritext	2,765.70
08/14/23	Professional Services - Schulte Roth & Zabel LLP	34,579.00

Total Expenses **\$44,354.55**

Total for Services and Expenses **\$1,256,909.55**